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9 Attorneys for Plaintiff  
UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 HAYK MARTIROSYAN,

17 Defendant.

No. 23-00468-TJH

STIPULATION REGARDING REQUEST FOR  
(1) CONTINUANCE OF TRIAL DATE AND  
(2) FINDINGS OF EXCLUDABLE TIME  
PERIODS PURSUANT TO SPEEDY TRIAL  
ACT

**CURRENT TRIAL DATE:** 01/30/24  
**PROPOSED TRIAL DATE:** 02/20/24

19  
20 Plaintiff United States of America, by and through its counsel  
21 of record, the United States Attorney for the Central District of  
22 California and Assistant United States Attorney Brittney M. Harris,  
23 and defendant Hayk Martirosyan ("defendant"), both individually and  
24 by and through his counsel of record, George G. Mgdesyan, Esq.,  
25 hereby stipulate as follows:

26 1. Defendant first appeared before a judicial officer of the  
27 court pursuant to a Criminal Complaint on September 11, 2023. The  
28 Indictment was filed on September 22, 2023. The Speedy Trial Act, 18

1 U.S.C. § 3161, originally required that the trial commence on or  
2 before December 1, 2023. Co-defendant Samvel Grigroyan is currently  
3 a fugitive.

4 2. On September 29, 2023, the Court set a trial date of  
5 November 14, 2023, at 10:00 a.m. A pretrial conference was  
6 subsequently scheduled for October 16, 2023, at 10:00 a.m. The Court  
7 subsequently continued the trial to January 30, 2024, and the  
8 pretrial conference to January 8, 2024, at 10:00 a.m., and found the  
9 interim time to be excluded under the Speedy Trial Act.

10 3. Defendant is detained pending trial. The parties estimate  
11 that the trial in this matter will last approximately two days.

12 4. By this stipulation, defendant moves to continue the trial  
13 date to February 20, 2024, at 10:00 a.m., and the pretrial conference  
14 to February 12, 2024, at 10:00 a.m. This is the second request for a  
15 continuance.

16 5. Defendant requests the continuance based upon the following  
17 facts, which the parties believe demonstrate good cause to support  
18 the appropriate findings under the Speedy Trial Act:

19 a. Defendant is charged with a violation of 18 U.S.C.  
20 §§ 371, 1960: Unlicensed Money Transmitting Business; Conspiracy.  
21 The government has prepared discovery for the defense should it be so  
22 requested, including reports, recordings, and photographs. The  
23 government has provided approximately 800 items of discovery to  
24 defense, including audio recordings, transcripts, reports, and other  
25 items.

26 b. On September 15, 2023, defendant's current counsel  
27 substituted in as counsel of record. Defense counsel is presently  
28 scheduled to be in the following trials: United States v. Darbinyan,

1 et al., CR No. 22-00034-CJC, which is scheduled to commence on  
2 January 23, 2024, and United States v. Airapetian, CR No. 23-00243-  
3 RGK, which is scheduled to commence on January 30, 2024.

4 Accordingly, counsel represents that he will not have the time that  
5 he believes is necessary to prepare to try this case on the current  
6 trial date.

7 c. In light of the foregoing, counsel for defendant also  
8 represents that additional time is necessary to confer with  
9 defendant, conduct and complete an independent investigation of the  
10 case, conduct and complete additional legal research including for  
11 potential pre-trial motions, review the discovery and potential  
12 evidence in the case, and prepare for trial in the event that a  
13 pretrial resolution does not occur. Defense counsel represents that  
14 failure to grant the continuance would deny him reasonable time  
15 necessary for effective preparation, taking into account the exercise  
16 of due diligence.

17 d. Defendant believes that failure to grant the  
18 continuance will deny him continuity of counsel and adequate  
19 representation.

20 e. The government does not object to the continuance.

21 f. The requested continuance is not based on congestion  
22 of the Court's calendar, lack of diligent preparation on the part of  
23 the attorney for the government or the defense, or failure on the  
24 part of the attorney for the Government to obtain available  
25 witnesses.

26 6. For purposes of computing the date under the Speedy Trial  
27 Act by which defendant's trial must commence, the parties agree that  
28 the time period of the date of the Court's corresponding order to

February 20, 2024, inclusive, should be excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(i) and (h)(7)(B)(iv) because the delay results from a continuance granted by the Court at defendant's request, without government objection, on the basis of the Court's finding that: (i) the ends of justice served by the continuance outweigh the best interest of the public and defendant in a speedy trial; (ii) failure to grant the continuance would be likely to make a continuation of the proceeding impossible, or result in a miscarriage of justice; and (iii) failure to grant the continuance would unreasonably deny defendant continuity of counsel and would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

7. Nothing in this stipulation shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods be excluded from the period within which trial must commence. Moreover, the same provisions and/or other provisions of the Speedy Trial Act may in the future authorize the exclusion of additional time periods from the period within which trial must commence.

IT IS SO STIPULATED.

Dated: December 22, 2023

Respectfully submitted,

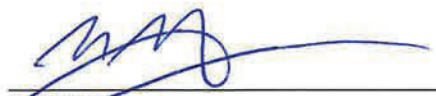
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United States Attorney

MACK E. JENKINS  
Assistant United States Attorney  
Chief, Criminal Division

/s/ Brittney M. Harris  
BRITTNEY M. HARRIS  
Assistant United States Attorney

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

I am Hayk Martirosyan's attorney. I have carefully discussed every part of this stipulation and the continuance of the trial date with my client. I have fully informed my client of his Speedy Trial rights. To my knowledge, my client understands those rights and agrees to waive them. I believe that my client's decision to give up the right to be brought to trial earlier than February 20, 2024 is an informed and voluntary one.

  
 GEORGE G. MGDESYAN, ESQ.  
 Attorney for Defendant  
 HAYK MARTIROSYAN

12/29/24  
 Date

This agreement has been read to me in Armenian, the language I understand best, and I have carefully discussed every part of it with my attorney. I understand my Speedy Trial rights. I voluntarily agree to the continuance of the trial date, and give up my right to be brought to trial earlier than February 20, 2024.

  
 HAYK MARTIROSYAN  
 Defendant

12/29/24  
 Date

**CERTIFICATION OF INTERPRETER**

I, George Mgedesyan, am fluent in the written and spoken English and Armenian languages. I accurately translated this entire agreement from English into Armenian to defendant Hayk Martirosyan on this date.

  
 INTERPRETER

12/29/24  
 Date